EXHIBIT C

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1 Quite him on in.				Page 31	T			Page 34
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4 A At Hencher Street. 5 Q. Like weer, 10 you living room, in the 5 Q. Like weer, 10 you living room, in the 6 Q. Like weer, 10 you living room, in the 7 Q. And yiliving room. 9 Q. Okay. 10 A Recause I was in my bed when he rang my doorbell. He liked to got it, but I said no. 11 Control by my house uninvited, you don't get in, 10 good to my house uninvited you don't get in, 10 good to my house uninvited you don't get in, 10 good to my house uninvited you house in the face to my house and the get in the get in the g		Q			1			
5 A. A. 4. Theodore Street. Q. Like were in your living room, in the kitchen? No. Olay. A. Company of the service of the se	1				1			
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because I don't want to see nobody. If you come by my house uninvited, you don't get in. 19		73	doorbell. He liked to got it, but I said no.					
13							identification)	
15 of your conversation? 16 A Yes, be did. 17 Q. Did he have a tape recorder? 18 A No. Pesides talking to him about your daughter, Mary, do you remember anything else that you spoke with the investigator about? 21 A No. 22 A No. 30 Q. Did the investigator ask you if you would— 24 MS. HARRIS: Strike that. 25 Q. Okay. Do you remember the investigator telling you anything about signing an affidavit? 26 A No. No, I don't remember the investigator telling you anything about signing an affidavit? 27 A No. No, I don't remember the investigator telling you anything about signing an affidavit? 28 A No. 29 Deyou - Think you said earlier that the investigators and that the surface of my daughter, be said. 29 Did you - I think you said earlier that the investigator said that the might be coming back. Did he ever come back? 31 A I said, "Why?" 32 A Roe and the ever come back? 33 A I said, "Why?" 44 Q. And what did he say in response? 45 A Because of my daughter, be said. 46 Q. Do you - I think you said earlier that the investigator said that he might be coming back. Did he ever come back? 47 A No. No, the didn't. 48 A No. 49 Q. Do you remember if he ever sent you any letters, anything like that? 40 Q. Do you remember if he ever sent you any letters, anything like that? 41 A No. 42 Q. And what did he ever call you on the phone after that? 43 A No. 44 A No. 45 Q. Do you remember if he ever sent you any letters, anything like that? 46 A No. 47 C Do you by the said of the coming back. 48 Q. Okay. Mid an, I see dark you have some earned that the surface of the properties of the propertie	1				13			
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22 A. No. 23 24 MS. HARRIS: Strike that. 23 24 25 24 25 24 26 25 24 26 26 26 26 26 26 26			daughter, Mary, do you remember anything else				for the record, we'll put on that these are	
23 Q. Did the investigator ask you if you would 24 MS. HARRIS: Strike that. 25 WS. HARRIS: Strike that. 26 Okay. Do you remember the investigator telling you anything about signing an affidavit? 28 A. No. No. I don't remember that. I sure don't. 3 A. No. No. I don't remember the investigator telling you anything at all about about possibly that you would possibly become involved in Mr. Drumgold's case for a new trial? 29 Q. Say. Do you remember the investigator telling you anything at all about about possibly that you would possibly become involved in Mr. Drumgold's case for a new trial? 30 A. Be did say something where they might subpoena me to court. He did say that. 31 Q. Do you 32 A. Bot when the say in response? 33 A. Is said, "Why?" 34 A. Bot all he was you go and a chance to your beack. 35 Q. Did you I think you said earlier that the investigator said that he might be coming back. Did he ever come back? 36 Q. Did you I think you said earlier that the investigator said that he might be coming back. A. But he did say he might the coming back are that? 4 A. Yes. 4 A. Yes. 4 Can you lust tell me was the voice of paper in font of you, and I'm assuming and if I'm word you just tell me what you have so that we herefore. 4 A. No. No, he didn't. 5 Q. Do you termember if he ever sent you any letters, anything like that? 5 Q. Do you go well these with you 5 Q. Okay. Ma am, I see that you have some documents that you brought with you today. 5 Q. Okay. Ma am, I see that you have some documents that you brought these with you 5 Q. Okay. When the second page? 6 Q. Do you remember if he ever sent you any letters, anything like that? 7 A. No. No, he didn't. 8 Depolation Exhibits Number 9 for identification 1 years of the record) 8 Y. M. Scaptical Properties of the record of the record page? 8 Depolation Exhibits Number 9 for identification 1 years of the record of the record page? 9 Q. Okay. The second pag							materials you provided to Mrs. Alexander this	
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2 anything about signing an affidavit? 3 A No. No. J don't remember that. I sure don't. 4 Qo Kay. Do you remember the investigator telling you anything at all about about possibly that you would possibly become involved in Mr. Drumgold's case for a new trial? 10 A He did say something where they might subpoena me to court. He did say that. 12 Q. Do you 13 A Is said, "Why?" 14 Q. And what did he say in response? 15 A Because of my daughter, he said. 16 Q. Did you I think you said earlier that the inject be coming back. 17 Did you I think you said earlier that the inject be coming back. 18 A No. Be didn't. 19 A No, he didn't men time he came to your bouse at Theodore Street? 10 A Yes. 2 Q. And did he ever call you on the phone after that? 2 A No. O, bour didn't member if he ever sent you any letters, anything like that? 2 Q. Okay. Ma'am, I see that you have some documents that you brought with you today. 2 Q. Okay. Well there's two pieces of paper in front of you, and I'm assuming and if I'm wrong, tell me, but I'm assuming that you brought these with you 2 M. SCAPICCHO: Is actually gave her those when she walked in. 3 A A A MS. SCAPICCHO: She didn't have the here we for the provision of the provaght these with you to brought with you to the prought with you to such as a contract the provision of the provision Exhibit Number 9 for identification () (Discussion off the record) 2 Do you remember when you saw the second page? 3 Do you go	1	0	Do you remember the investigator telling you	rage 32	1		even look at them	Page 35
3 A. No. No, I don't remember that. I sure 4 don't. 5 Q. Okay. Do you remember the investigator telling you anything at all about — about possibly—that you would possibly become involved in Mr. Drumgold's case for a new trial? 9 A. He did say something where they might 10 subpoena me to court. He did say that. 10 Q. Do you— 13 A. I said, "Why?" 14 Q. And what did he say in response? 15 A. Because of my daughter, he said. 16 Q. Did you—I think you said earlier that the investigator said that he might be coming back. Did he ever come back? 19 A. No, he did not come back. 19 A. No, he did not come back. 19 A. No, he did not come back became no time he came to your bouse at Theodore Street? 10 A. Yes, 2 Q. Oad, Mr. Alexander, I'm going to show you a two-page document and you take a minute and look that over, and I'm going to ask you some questions about that (handing document). 10 Canyou i. T think you said earlier that the investigator said that he might be coming back. 2 Q. So the—Old did not come back. 19 A. No, he did not come back. 19 A. No, he did not come back. 20 Q. So the—Old did say he might be coming back. 2 gentleman was the one time he came to your bouse at Theodore Street? 10 A. Because of my daughter, he said. 4 g. Did to the ever come back? 1 g. Did to the ever come back. 1 g. So the did say he might be coming back. 2 g. So the—Old did not come back. 1 g. So the did say he might be coming back. 2 g. Oad did he ever call you on the phone after that? 14 A. Yes. 2 Q. Oad did he ever call you on the phone after that? 15 A. So when the did he ever call you on the phone after that? 16 Letters, anything like that? 17 A. No. No, I did int. Each and the might be coming back. 2 g. Oad did he ever call you on the phone after that? 18 Q. Oay. Well there's two pieces of paper in front of you, and I'm assuming — and if I'm wrong, tell me, but I'm assuming that you brought these with you— 18 M. ScAPICCHO: 1 actually gave her those when she walked in. 19 M. ScAPICCHO: She didn't have the brought these with you— 20		Ų.						
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5 Q. Okay. Do you remember the investigator to telling you anything at all about about possibly that you would possibly become involved in Mr. Drumgold's case for a new trial? A He did say something where they might subpoena me to court. He did say that. Q Do you 13 A I said, "Why?" 14 Q And what did he say in response? 15 A Because of my daughter, he said. Q Did you I think you said earlier that the investigator said that he might be coming back. Q So the Only time that you met with this gentleman was the one time he came to your house at Theodore Street? A Yes. Q And did he ever call you on the phone after that? A No. No. he did not come back. Q Do you remember if he ever sent you any letters, anything like that? A No. No. No, he didn't. Q Okay. I think you just said that you only saw the second page. Yes, it is. MS HARRIS: Okay. Page 33 A Mere? What documents? Q Okay. Well there's two pieces of paper in front of you, and I'm assuming and if I'm wrong, tell me, but I'm assuming that you brought these with you MS SCAPICCHO: She didn't have the before. MS HARRIS: Okay. A A A Merics okay. MS SCAPICCHO: actually gave her those when she walked in. MS HARRIS: Okay. A A And this is what the law office wrote me, and	4		don't.		4	Q	Okay. Mrs. Alexander, I'm going to show you	
possibly that you would possibly become involved in Mr. Drumgold's case for a new trial? A. He did say something where they might subpoena me to court. He did say that. Q. Op you A. I said, "Why?" A. Q. Did you think you said earlier that the investigator said that he might be coming back. Did he ever come back? A. Ro, be did not come back. Q. So he Year and the did say he might be coming back. Did he ever come back? A. Ro, be did not come back. Q. So he Year and there's a signature free (pointing). Is that your signature? A. No, he did not come back. Year and a mr. Year you ever seen this document before, ma'amr. Year and a mr. Year and a mr. Year and a mr. Year and a mr. Year your for a ma'mr. Year your and a mr. Year your your seen this document on the fore second page of the document, and there's a signature free (pointing). Is that your Sussibly - Tim going to ask you to look at the second page of the document, and there's a signature free (pointing). Is that your Sussibly - Tim going to ask you to look at the second page of the document, and there's a signature free (pointing). Is that your New Jear Yes, it is. M.S. HARRIS: Why don't we mark this as the next exhibit. (Two-page document marked Deposition of the record) By MS. HARRIS: Why don't we mark this as the next exhibit. (Two-page document marked Deposition of the record) By MS. HARRIS: Year A dea Theodore Street? Year The second page. I've never seen this top page (pointing). Year Yes, it is. O Okay. I think you just said that y		Q.	Okay. Do you remember the investigator				a two-page document and you take a minute and	
involved in Mr. Drumgold's case for a new trial? 10 A. He did say something where they might subporan me to court. He did say that. 11 Subporan me to court. He did say that. 12 Q. Do you 13 A. I said, "Why?" 14 Q. And what did he say in response? 15 A. Because of my daughter, he said. 16 Q. Did you I think you said earlier that the investigator said that he might be coming back. 17 A. No, he did not come back. 18 Back. Did he ever come back? 19 A. No, he did not come back. 20 Q. So he 21 A. But he did say he might be coming back. 22 Q. So the only time that you met with this gentleman was the one time he came to your house at Theodore Street? 1 A. Yes. 20 Q. And did he ever call you on the phone after that? 3 A. Yes. 20 Q. And did he ever call you on the phone after that? 4 A. No. 5 Q. Do you remember if he ever sent you any letters, anything like that? 7 A. No. No, he didn't. 8 Q. Okay. Ma'am, I see that you have so that we can put that on the record? 10 Can you just tell me what you have so that we can put that on the record? 11 A. Yes. 20 Cokay. Well there's two pieces of paper in front of you, and I'm assuming and if I'm wrong, tell me, but I'm assuming that you brought these with you 10 Ms. ScAPICCHO: I actually gave her those when she walked in. 11 Ms. HARRIS: Okay. 12 A. Alker? What doeuments? 13 M. Starkins. Okay. 14 A. Sex. 15 A. Because of my daughter, he said. 16 Dayou remember when you saw the second page? 17 A. Yes. 28 Okay. Well there's two pieces of paper in front of you, and I'm assuming and if I'm wrong, tell me, but I'm assuming that you brought these with you 17 Ms. ScAPICCHO: She didn't have there (pointing). Is that your signature there (pointing). 18 A. Yes. 29 Okay. Well there's two pieces of paper in front of you, and I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm though the protein the private investigator brought this document with him to your house? 19 Ms. HARRIS: Okay. 10 Okay. Well there's two piec			telling you anything at all about about				look that over, and I'm going to ask you some	
y trial? A. He did say something where they might subpoena me to court. He did say that. D. O you A. I said, "Why?" A. A. I said, "Why?" A. O Recause of my daughter, he said. Did you I think you said earlier that the investigator said that he might be coming back. Did he ever come back? A. Ro, be did not come back. O. So he D. O So he D. O So he only time that you met with this gentleman was the one time he came to your house at Theodore Street? A. Yes. O. And did he ever call you on the phone after that? A. No. D. O you remember if he ever sent you any letters, anything like that? A. No. No, he didn't. O. O you you remember if he ever sent you have so that we can put that on the record? C. O you just tell me what you have so that we can put that on the record? O. Okay. Well there's two pieces of paper in from for you, and I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming that you brought these with you wrong, tell me, but I'm assuming that you brought these with you wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assuming and if I'm wrong, tell me, but I'm assumin			involved in Mr. Drumgold's case for a new		1			
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11 subpoena me to court. He did say that. 2 Q. Do you 13 A. I said, "Why?" 14 Q. And what did he say in response? 15 A. Because of my daughter, he said. 16 Q. Did you I think you said earlier that the 17 investigator said that he might be coming 18 back. Did he ever come back? 19 A. No, he did not come back. 20 Q. So he 21 A. But he did say he might be coming back. 22 Q. So the only time that you met with this 23 gentleman was the one time he came to your 24 house at Theodore Street? 25 A. Yes. 26 Q. And did he ever call you on the phone after 27 that? 28 Q. Okay. Ma'am, I see that you have some 28 documents that you brought with you today. 29 Q. Okay. Ma'am, I see that you have some 29 documents that you brought with you today. 20 Q. Okay. Well there's two pieces of paper in 29 G. Okay. Well there's two pieces of paper in 20 Gokay. Well there's two pieces of paper in 21 front of you, and I'm assuming and if I'm 22 wrong, tell me, but I'm assuming hat you 23 hence the those when she walked in. 24 between the three when she walked in. 25 between the three when she walked in. 26 Cokay. Well there's two pieces of paper in 27 Ms. SCAPICCHIO: I actually gave here the when she walked in. 28 Ms. HARRIS: Okay. 29 A. And did he ever call you on the phone after 30 that? 31 L sake the probability in the that you have some 32 document marked 33 Deposition Exhibit Number 9 for identification) 34 Deposition Exhibit Number 9 for identification) 35 Ms. HARRIS: Why don't we mark 36 this as the next exhibit. 39 (Two-page document marked 30 Deposition Exhibit Number 9 for identification) 31 Q. Okay. I think you just said that you only saw the second page? 3 A. The second page? 3 A. The second page? 3 A. No. 4 No. 5 Q. Okay. Ma'am, I see that you have some 4 documents that you brought with you today. 5 Q. Okay. Well there's an	1	A.						
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14 O. And what did he say in response? 14 A. Second page of the document, and there's a signature there (pointing). Is that your signature? 15		Q.	Do you					
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16 Q. Did you I think you said earlier that the 1 investigator said that he might be coming back. Did he ever come back? 19 A. No, he did not come back. 19 this assuming that the might be coming back. Did he ever come back? 18 MS. HARRIS: Why don't we mark this as the next exhibit. 19 this as the next exhibit. 19 this as the next exhibit. 19 this as the next exhibit. 10 Charlon page document marked 16 Deposition Exhibit Number 9 for identification 10 Discussion off the record) 10 Discussion off the record) 10 Discussion off the record) 10 Deposition Exhibit Number 9 for identification 10 Discussion off the record) 10 Discussion off the record) 11 Deposition Exhibit Number 9 for identification 10 Discussion off the record) 12 A. Yes. 10 Q. Okay. I think you just said that you only saw the second page? 10 Q. Okay. Ma'am, I see that you have some documents that you brought with you today. 10 Cap you just tell me what you have so that we can put that on the record? 10 Q. Okay. Well there's two pieces of paper in front of you, and I'm assuming and if I'm wrong, tell me, but I'm assuming hat you brought these with you MS. SCAPICCHIO: I actually gave he frose when she walked in. 18 Q. Okay. HARRIS: Okay. Okay. 19 A. No, I don't remember. 19 MS. HARRIS: Okay. Okay. 19 A. No, I don't remember when you saw the second page? 10 Do you remember whether or not the private investigator brought this document with him to your house? 17 A. No, I don't remember whether or not the private investigator brought his document with him to your house? 18 A. The scape of the record) 19 A. No, I don't remember whether or not the private investigator brought in the brought I don't remember; that's what I'm saying. 18 A. The scape of the record) 19 A. No, I don't remember. 19 A. No, I don't remember if he brought I don't remember; that's what I'm saying. 19 A. I don't remember. 19		Q. A	Recause of my daughter he said		t		signature there (pointing). Is that your	
investigator said that he might be coming lab back. Did he ever come back? A. No, he did not come back. O. So he O. So he O. So the only time that you met with this gentleman was the one time he came to your house at Theodore Street? A. Yes. A. Yes. A. Yes. O. A. No. A. Yes. O. A. No. A. No. O. Do you remember if he ever sent you any letters, anything like that? A. No. No, he didn't. O. Okay. Ma'am, I see that you have some documents that you brought with you today. Can you just tell me what you have so that we can put that on the record? A. No. O. Okay. Well there's two pieces of paper in front of you, and I'm assuming and if I'm twong, tell me, but I'm assuming and if I'm twong, tell me, but I'm assuming that you brought these with you MS. SCAPICCHIO: I actually gave her those when she walked in. MS. HARRIS: Okay. A. I don't remember. A. Yes, it is. MS. HARRIS: Why don't we mark this as the next exhibit. (Two-page document marked D. Deposition Exhibit Number 9 for identification) (Discussion off the record) BY MS. HARRIS: (Do kay. I think you just said that you only saw the second page? The second page? The second page. 1 Q. Okay. I think you just said that you only saw the second page? The second page? A. No. Can there whe have seen the top page A. No. Q before? Do you remember when you saw the second page? A. No, I don't, but I remember seeing that with my well when I put my signature on it. I don't remember. Do you remember whether or not the private investigator brought this document with him to your house? A. No, I don't remember. Do you don't remember. A. No, I don't remember if he brought I don't remember; that's what I'm saying. D. Okay. A. I don't remember.		0.	Did you I think you said earlier that the		1		signature?	
back. Did he ever come back? A No, he did not come back. 19 A No, he did not come back. 19 A But he did say he might be coming back. 20 Q. So he 21 A But he did say he might be coming back. 21 A But he did say he might be coming back. 22 Q. So the only time that you met with this gentleman was the one time he came to your house at Theodore Street? 24 BYMS. HARRIS: 25 Page 33 1 A Yes. 2 Q. And did he ever call you on the phone after that? 3 that? 4 A No. 5 Q. Do you remember if he ever sent you any letters, anything like that? 5 Q. Do you, he didn't. 6 A No. No, he didn't. 7 A No. No, he didn't. 8 Q. Okay. Ma'am, I see that you have some documents that you brought with you today. 10 Can you just tell me what you have so that we can put that on the record? 11 Q. Okay. Well there's two pieces of paper in front of you, and I'm assuming and if I'm wrong, tell me, but I'm assuming that you brought these with you 15 MS. SCAPICCHIO: I actually gave 16 he those when she walked in. 17 MS. HARRIS: Okay. 18 MS. HARRIS: Okay. 19 MS. HARRIS: Okay. 20 Okay. 21 A And this is what the law office wrote me, and 22 A. And this is what the law office wrote me, and 23 this as the next exhibit. (Two-page document marked Deposition Exhibit Number 9 for identification) 10 Deyoustion Exhibit Number 9 for identification) 10 Deyous the record) 12 A. Yes. 1 Q. Okay. I think you just said that you only saw the second page. 1 Ver never seen the top page 6 A. No. 7 Q before? 9 Do you remember when you saw the second page? 10 A. No, I don't put my signature on it. I don't remember. 11 don't remember. 12 A. Where? What documents? 13 Deyous remember whether or not the private investigator brought this document with him to your house? 14 Deyous remember whether or not the private investigator brought this document with him to your house? 15 Deyous remember yes or no?	1	•	investigator said that he might be coming			Α		
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22 Q. So the only time that you met with this 23 gentleman was the one time he came to your 24 house at Theodore Street? Page 33 1 A. Yes. 2 Q. And did he ever call you on the phone after 3 that? 4 A. No. 5 Q. Do you remember if he ever sent you any 6 letters, anything like that? 7 A. No. No, he didn't. 9 Q. Okay. Ma'am, I see that you have some 9 documents that you brought with you today. 10 Can you just tell me what you have so that we 11 can put that on the record? 12 A. Where? What documents? 13 Q. Okay. Well there's two pieces of paper in 14 front of you, and I'm assuming - and if I'm 15 wrong, tell me, but I'm assuming that you 16 brought these with you- 17 MS. SCAPICCHIO: I actually gave 18 her those when she walked in. 19 MS. HARRIS: Okay. 20 And this is what the law office wrote me, and 21 don't remember. 22 identification) 23 (Discussion off the record) 24 BY MS. HARRIS: 22 identification) 23 (Discussion off the record) 24 BY MS. HARRIS: 22 identification) 23 (Discussion off the record) 24 BY MS. HARRIS: Page 33 1 Q. Okay. It think you just said that you only saw the second page? 3 A. No. 4 A. No. 4 A. No. 5 Q. Do you remember if he ever sent the top page 6 A. No. 7 Q before? 8 Do you remember when you saw the second page? A. No, I don't, but I remember seeing that with my well when I put my signature on it. I don't remember. 15 don't remember. 16 I've not seen this (pointing). 17 A. No, I don't remember. 18 Q. Okay. So you don't remember. 19 AS. SCAPICCHIO: I actually gave investigator brought this document with him to your house? 20 Okay. So you don't remember yes or no? 3 A. The second page? 4 A. No. 7 Q before? 8 Do you remember when you saw the second page? A. No, I don't remember. 19 AS. CAPICCHIO: I actually gave investigator brought this document with him to your house? 19 AS. CAPICCHIO: I actually gave investigator brought this document with him to your house? 19 AS. CAPICCHIO: I actually gave investigator brought this have investigator brought this have investigator br	1							
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2 Q. And did he ever call you on the phone after 3 that? 3 A. No. 5 Q. Do you remember if he ever sent you any 6 letters, anything like that? 7 A. No. No, he didn't. 8 Q. Okay. Ma'am, I see that you have some 9 documents that you brought with you today. 10 Can you just tell me what you have so that we 11 can put that on the record? 12 A. Where? What documents? 13 Q. Okay. Well there's two pieces of paper in 15 wrong, tell me, but I'm assuming and if I'm 16 brought these with you 17 MS. SCAPICCHIO: I actually gave 18 her those when she walked in. 19 MS. HARRIS: Okay. 20 MS. HARRIS: Okay. 21 A. And this is what the law office wrote me, and 2 Saw the second page? 3 A. The second page? 4 A. No. 4 No. 5 Q. You've never seen the top page 6 A. No. 7 Q before? 8 Do you remember when you saw the second page? 10 A. No, I don't, but I remember seeing that with my well when I put my signature on it. I don't remember. 11 my well when I put my signature on it. I don't remember. 12 don't remember. 13 Q. Do you remember whether or not the private investigator brought this document with him to your house? 14 A. No, I don't remember. 15 Wiscond page? 16 A. No. 18 Q. You've never seen the top page 18 A. No. 19 A. No, I don't, but I remember seeing that with my well when I put my signature on it. I don't remember. 19 Q. Do you remember whether or not the private investigator brought this document with him to your house? 17 A. No, I don't remember. 18 Q. Okay. So you don't remember yes or no? 19 A. No, I don't remember if he brought I'm not sure. I don't think he brought I don't remember; that's what I'm saying. 20 Q. Okay. 21 A. And this is what the law office wrote me, and	1	A.	Yes.	rage 33	1	O	Okay. I think you just said that you only	rage 30
that? 4 A. No. 5 Q. Do you remember if he ever sent you any 6 letters, anything like that? 7 A. No. No, he didn't. 8 Q. Okay. Ma'am, I see that you have some 9 documents that you brought with you today. 10 Can you just tell me what you have so that we can put that on the record? 11 Q. Okay. Well there's two pieces of paper in front of you, and I'm assuming and if I'm wrong, tell me, but I'm assuming that you brought these with you 18 MS. SCAPICCHIO: I actually gave 19 MS. SCAPICCHO: She didn't have them before. 10 MS. HARRIS: Okay. 11 Mary 12 MS. HARRIS: Okay. 22 MS. HARRIS: Okay. Okay. 23 A. The second page. I've never seen this top page (pointing). 4 You've never seen the top page 6 A. No. 7 Q before? 8 Do you remember when you saw the second page? 10 A. No, I don't, but I remember seeing that with my well when I put my signature on it. I don't remember. 11 I've not seen this (pointing). 12 I've not seen this (pointing). 13 I've not seen this (pointing). 14 Q. Do you remember when you saw the second page? 15 A. No, I don't, but I remember seeing that with my well when I put my signature on it. I don't remember. 16 I've not seen this (pointing). 18 Q. Do you remember when you saw the second page? 19 A. No, I don't remember. 10 A. No, I don't remember. 11 Ve not seen this (pointing). 12 Ve not seen this (pointing). 13 I've not seen this (pointing). 14 Oo by our remember when you saw the second page? 15 A. No, I don't remember. 16 Do you remember when you saw the second page? 17 A. No, I don't remember. 18 Q. Okay. So you don't remember yes or no? 29 A. No, I don't remember if he brought I'm not sure. I don't think he brought I'd on't remember; that's what I'm saying. 20 Okay. 21 A. No, I don't remember. 22 A. No, I don't remember. 23 A. I don't remember.						~	saw the second page?	
5 Q. Do you remember if he ever sent you any 6 letters, anything like that? 7 A. No. No, he didn't. 8 Q. Okay. Ma'am, I see that you have some 9 documents that you brought with you today. 10 Can you just tell me what you have so that we 11 can put that on the record? 12 A. Where? What documents? 13 Q. Okay. Well there's two pieces of paper in 14 front of you, and I'm assuming and if I'm 15 wrong, tell me, but I'm assuming that you 16 brought these with you 17 MS. SCAPICCHIO: I actually gave 18 her those when she walked in. 19 MS. HARRIS: Okay. 20 MS. HARRIS: Okay. 21 A. And this is what the law office wrote me, and 25 Q. You've never seen the top page 6 A. No. 7 Q before? 8 Do you remember when you saw the second page? 10 A. No, I don't, but I remember seeing that with my well when I put my signature on it. I don't remember. 11 don't remember. 12 don't remember. 13 Q. Do you remember whether or not the private investigator brought this document with him to your house? 15 A. No, I don't remember. 16 A. No. 7 Q before? 8 Do you remember when you saw the second page? 10 A. No, I don't, but I remember seeing that with my well when I put my signature on it. I don't remember. 16 Under the member when you saw the second page? 18 A. No, I don't remember. 19 A. No, I don't remember. 19 A. No, I don't remember. 20 Okay. So you don't remember yes or no? 21 I don't remember; that's what I'm saying. 22 Q. Okay. 23 A. And this is what the law office wrote me, and		-			3	A	. The second page. I've never seen this top	
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22 MS. HARRIS: Okay. Okay. 22 Q. Okay. 23 A. And this is what the law office wrote me, and 23 A. I don't remember.								-
23 A. And this is what the law office wrote me, and 23 A. I don't remember.						O	Okav.	
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Ι.		this document is the 20th of Mary 5 2002	Page 37			Pag	ge 40
1 2		this document is the 28th of May of 2003. Does that help place in your mind when you		1		to putting your signature on the document?	
3		saw this document?		3		A. No, I didn't. Q. Do you remember why you signed this document?	
4	A	No, it doesn't.		4		A. No, I don't.	
5	Ç	Okay. Where it says 20 the number,		5		Q. Do you remember who asked you to sign it?	
6		numerals 28 that are written, is that in your		6	,	A. No, I don't.	
7		handwriting?		7	(Q. Do you have a copy of this document in your	
8 9	C	. (Handing document) 2. I'll just ask you to keep it in front of you		8		records or in your possession?	
10	`	until we're done.		10		A. No, I don't. Q. You, I think, had a chance to look over the	
11		Do you see where I'm referring,		11		first page of the document, correct?	
12		the numerals 28 (pointing)?		12		A. Yes.	
13		. Yeah.		13		Q. Does any of that information	
14		So does it appear that you wrote the 28? (No response)		14		MS. HARRIS: Or strike that.	
16	Ö	If you can't tell, you know		15 16	,	Q. Do you do you know where any of the information on the first page of this	
17	Α	. I can't tell.		17		document came from?	
18	Q	Okay. But in any event		18		A. No.	
19 20	0	MS. HARRIS: Or strike that.		19		Q. On the first by number one on the first	
21	Q	Do you remember, ma'am, whether you saw this, the second page of this document, before you		20 21		page of this document, it states, "On the	
22		testified in Mr. Drumgold's motion hearing?		22		night of August 19, 1988, I was living at 72 Homestead Street in Roxbury, Massachusetts,	
23	Α	. I don't remember.		23		with my daughter and grandson." Is that an	
24	Q	You don't remember whether one way or the		24		accurate statement assuming that this	
			Page 38	<u> </u>		Page	e 41
1		other?		1		statement is purporting to be information	;C 41
2	Α	No, ma'am, one way or the other, I don't		2		that you provided?	
3	^	remember.		3		A. I'm not	
5	Q	Okay. Do you have any idea who wrote this document?		4		Q. Do you understand?	
6	Α	No.		5		A understanding you. Q. I'm sorry, that was a bad question.	
7		But you didn't write it?		7	`	This document says from the	
8		No.		8		beginning, "I, Lola Alexander, hereby depose	
9	Q.	Okay.		9		and state on the night of August 19th I was	
10	A.	Oh, can I ask you one thing? This whole document (pointing)?		10		living on 72 Homestead Street in Roxbury with	
12	Ο.	Mm-hmm.		11		my daughter and grandson." Is it accurate that on August 19th you were living at	
13	A.	No, I don't have any idea who wrote it.		13		Homestead Street with your daughter and	
14	Q.	Okay. Ma'am, before coming here today, did		14		grandson?	
15		you speak to anybody about the fact that you		15	Α	A. (No response)	
16 17		were going to be coming in for a deposition in this case?		16	Q). Is that a true statement?	
18	Α.	No.		17 18	A	L I'm still not I was I was living there with my daughter and grandson, but I had my	
19		Okay. Mr. Allah brought you in today,		19		other kids too.	
20		correct?		20	Q). Okav	
21		Yes.		21	Α	They were there. We just weren't alone, just	
22 23	Ų.	Did you speak with True See about the fact that you were going to be deposed in this		22	_	me and my daughter and grandson.	
24		case today?		23 24	Q	Okay. And then it goes on to say in the second paragraph that you heard gunshots from	
				27		second paragraph that you heard guilshots from	
١,	A	No Livet told him I had to go downtown for	Page 39			Page	42
1 2	<i>P</i> 1.	No, I just told him I had to go downtown for some business.		1 2		your bedroom. Is that a true statement? . Yes.	
3	Q.	Did you show him a copy of the subpoena that		3		It goes on to say, "I went to the window and	
4		you received?		4	~	saw my daughter, Mary Alexander, on the porch	
5		No.		5		with her baby son. I went to the door and	
6	Q.	Okay. Did you tell him that you were going		6		told her to get inside with the baby right	
7 8	Δ	to be talking about the Drumgold case today? No, I did not.		7		away." Is that what you	
9	O.	Okay. Did he ask you any questions about		8 9	A.	Yes. "Once inside, Mary told me that she thought	
10		what you were doing downtown today?		10	ν.	someone had got shot near the mailboxes." Is	
i		No.		11		that a true statement?	- 1
12	Q.	Did you have you spoken with anybody on		12		. Yes.	ı
13 14		behalf of Shawn Drumgold prior to coming in today?	1	13	Q.	Rather than having me	
15	A.	No, ma'am.		14 15		MS. HARRIS: Well, strike that. Strike that.	
16	Q.	Okay. At any time from the date that the	1	16	0.	In Paragraph 7 there's a reference to "I	ı
17	-	private investigator came to your house on		17	₹.	believe Detective Walsh."	
18		Theodore Street until today, have you had any	1	18		(Nods head)	1
19 20		conversations either with Ms. Scapicchio or	i i	19	Q.	Detective Walsh is named. Do you know who	- 1
	Α	anybody else representing Mr. Drumgold? No, ma'am. No, ma'am.		20 21	٨	Detective Walsh is? That's who was at the detective that	
		Okay. On the second page of this document,	1	21 22	A.	That's who was the detective that I remember now. That's the detective that kept	1
23		there are a couple of sentences, and I'm		23		coming and kept doing all the calling and all	
24		wondering, did you read those sentences prior	1	24		of that.	
		DAL COURT DEPORTEDO					- 1